



DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO NY 14207-3199

March 9, 2017

SUBJECT: Blanchard River Watershed Study, letter dated February 22, 2017

The Honorable Sherrod Brown
United States Senate
Washington, DC 20510

Dear Senator Brown:

Thank you for your letter dated February 22, 2017 regarding the Blanchard River Watershed Study, cosigned by Senator Portman and Representative Latta. An identical letter is being sent to the other Members of Congress who cosigned the letter.

In June 2016, the Hancock County Commissioners informed the U.S. Army Corps of Engineers, Buffalo District of their intention to transition to a non-federal flood risk management project and hired a design firm, Stantec Consulting Services, Inc., to assist them in that effort. In January 2017, the Buffalo District completed the transition of the study to the County and Stantec. The Buffalo District anticipates a future Section 404 Clean Water Act permit application and is currently serving the project sponsor in a regulatory capacity. To that end, Buffalo District Regulatory staff held a pre-application meeting with Hancock County officials on October 6, 2016 in order to discuss the permit process and informational requirements.

The Blanchard River Watershed Study considered and screened a multitude of flood risk management measures which were subsequently combined into flood risk management alternatives. These measures and alternatives were evaluated through a rigorous process in accordance with federal policy. Federal policy requires that the feasibility study identify the plan that reasonably maximizes net National Economic Development (NED) benefits consistent with avoiding and minimizing impacts to the social, physical, and natural environment. A detailed explanation of the process and the resulting screening and evaluation of measures and alternatives were outlined in the Draft Feasibility Report, dated April 2015. The NED Plan identified at the time of transmission to the local sponsor was a diversion channel sized for a 25-year event. This plan had the highest benefit-to-cost ratio, maximized net benefits, and was the least environmentally damaging practicable alternative in accordance with policy for federal water resource projects.

A non-federal project sponsor has the ability to evaluate and screen flood risk measures and alternatives utilizing their own policies and screening criteria which best meet their objectives. Evaluation of alternatives using a different process could result in the selection of an alternative flood risk management plan which differs from the one selected by the U.S. Army Corps of Engineers.

The letter mentioned gaps and discrepancies in Corps data and analysis as identified by Stantec. We understand that Stantec identified a discrepancy in hydraulic modeling in September 2016. A water surface elevation reduction of 4.6 feet was presented in a graphic developed for a public meeting in August 2015. In an effort to be transparent and provide the most up-to-date information to the public during the August 2015 public meeting, preliminary modeling results were presented that had not been vetted through our standard review process. Incorrect water surface elevation reductions were reported, leading to false expectations as to the potential reductions that could be achieved. This was explained to Stantec and the non-federal sponsor when the discrepancy was brought to our attention.

While we regret providing incorrect information to the public, the error had no impact on the USACE project development and evaluation process. The benefits analysis and design were based on modeling analyses that did not include this error. The recommended flood risk management plan, i.e. the diversion channel, provided the greatest net economic benefits and was based on a model which used a water surface elevation reduction of approximately two feet in Findlay, Ohio.

The Corps of Engineers is supportive of any effort to reduce flood risk along the Blanchard River and will continue to work with the community in evaluating the County's proposal through our regulatory role.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam J. Czekański', with a stylized flourish at the end.

Adam J. Czekański, P.E., PMP
Lieutenant Colonel, Corps of Engineers
District Commander